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January 8, 2019

Honorable Deborah A. Batts
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States of America v. Jordan Cohen*
Docket No.: 17-CR-289

Dear Judge Batts:

I along with Steven Brill, Esq. represent Defendant Jordan Cohen. We write to respectfully ask Your Honor to extend the date by which the parties' sentencing submissions are due, and to set a sentencing date convenient to the Court after the proposed submission dates. Currently, defense submission are due on January 14, 2019, with any responsive submissions from the government due on January 28, 2019. We respectfully propose the following:

- Defense submissions due February 25, 2019; and
- Government submissions due March 11, 2019.

As Mr. Cohen remains detained at the MDC Brooklyn, facing a mandatory minimum sentence of 120 months, we are working on a voluminous sentencing submission by which we will supply the Court with facts and argument under 18 U.S.C. §3553(a). One aspect of our work, among others, that will require additional time, is a life plan we intend to include in our submission. This will of course address the §3553(a)(2)(C) factor of specific deterrence. We are working with Simone Gordon, a Doctor of Social Work, to complete the life plan, and based on the time needed for us to acquire necessary documents and records, and for Dr. Gordon to complete her work, we believe the requested extension is necessary to provide Mr. Cohen with the effective assistance of counsel and present the Court with all the necessary information with which to evaluate the §3553(a) factors in Mr. Cohen's case.

We have conferred with the Government, by AUSA Sebastian Swett, which consents to this request, including the proposed schedule of submissions.

Your Honor's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone

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Cc: Sebastian Swett, Esq.
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